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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

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COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

vs.

DAVID GILBERT SAFFRON, et al.,

Defendants.

**SWORN STATEMENT OF MOVANT IN  
SUPPORT OF MOTION TO QUASH**

Case No. 2:19-cv-1697-JAD-DJA

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COMES NOW James Damien Scott hereby declares under oath the following:

1. I am an adult over the age of 18 and I am competent to testify in court.
2. I have personal knowledge of the facts contained in this declaration.
3. I am an employee of Bedrock Protection Agency, LLC (“Bedrock”).
4. I have worked at Bedrock for years and my current role is in operations and business logistics.
5. I am not a shareholder or corporate officer of Bedrock.

6. On November 12, 2020, I was served with a subpoena duces tecum, demanding JP Morgan Chase Bank produce all my personal financial records to the Commodity Futures Trading Commission (“the CFTC”).

7. To my understanding, the subpoena was issued as part of the CFTC’s case against David Saffron.

8. I do not have a relationship with David Saffron.

9. I am not employed by David Saffron.

10. I have never been employed by David Saffron.

11. I do not have any business dealings with David Saffron or his company, Circle Society.

12. To my understanding, David Saffron is being investigated by the CFTC for his activities involving crypto-currencies or some other form of alternative-coin investments or commodities.

13. I do not own or trade any type of cryptocurrency and I do not own or trade any alternative-coin investments or commodities.

14. Given my lack of relationship with David Saffron and any association with the charges against him, I strongly object to providing my personal financial records to the CFTC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 23<sup>rd</sup> day of November 2020 at Salt Lake City, Utah.

/s/ James Damien Scott  
James Damien Scott